

## **Exhibit A**

**From:** Hamilton, Rayner  
**Sent:** Monday, August 06, 2007 5:51 PM  
**To:** RHaefele@motleyrice.com  
**Subject:** Defendant Ahmed Zaki Yamani  
**Attachments:** 4952744\_2.DOC

Please see the attached. RMH

## RAYNER M. HAMILTON

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August 6, 2007

VIA FACSIMILE AND REGULAR MAIL

Ronald L. Motley, Esq.  
Robert T. Haefele, Esq  
Motley Rice LLC  
28 Bridgeside Boulevard  
Mt. Pleasant, SC 29464

Re: 03 MDL 1570 (GBD)  
Burnett (03 CV 9849, 5738)(RCC)  
Euro Brokers (04 CV 7279)(RCC)  
World Trade Ctr. Prop. (04 CV 7280)

Gentlemen:

Following up on our various communications of a year ago, as you are no doubt aware, on August 2, 2007 Judge Daniels filed an order vacating the default judgments entered against my client, Ahmed Zaki Yamani, in the above-mentioned cases. Plaintiffs have been directed to respond to his filed motion to dismiss.

May I suggest that the appropriate response from plaintiffs would be to dismiss Mr. Yamani as a defendant in all cases as, in my view, plaintiffs cannot establish that the court has jurisdiction over him and in any event, based upon the law of the case and accepted legal principles generally, cannot plead viable causes of action against him. As noted in Mr. Yamani's motion to dismiss, the Federal Insurance plaintiffs have already voluntarily dismissed their complaint against Mr. Yamani. See Motion (MDL Docket #1833) at 10.

If plaintiffs cannot be prevailed upon to do the former, then I wish to establish a briefing schedule on the pending motion such that it can be heard and resolved at the earliest possible date. May I suggest a deadline for plaintiffs' responsive papers of September 21, 2007 and a deadline for defendant's reply of October 19, 2007? Please advise at your earliest opportunity so that an appropriate stipulation can be filed.

Very truly yours,

Rayner M. Hamilton

Cc: James P. Kreindler, Esq.  
Elliot R. Feldman, Esq.  
Sean Carter, Esq.  
Co-Chairs, Plaintiffs' Executive Committees

Michael K. Kellogg, Esq.  
Chair, Defendants' Executive Committee